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May 16, 2025

VIA ECF

Honorable Gary Stein
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street, Room 9A
New York, New York 10007

MEMO ENDORSED

Re: *ALBERTO RAMOS v. PALM WEST CORPORATION et al.*
Civil Action No. 23-cv-09441

Dear Honorable Judge Stein,

I represent Plaintiff Alberto Ramos in the above-referenced matter. With the consent of Defendants' counsel and for the unanticipated personal reasons set forth below, I respectfully request an adjournment of at least three weeks of the currently scheduled Settlement Conference with Your Honor on June 6, 2025. The need for this request arises an unexpected personal matter, as set forth below. This is Plaintiff's first request. On April 24, 2025, the Court adjourned the April 25, 2025 Settlement Conference to June 6, 2025. (ECF No. 104.)

By way of background, I reside in Florida with my four-year old daughter and am subject to a long-distance custody agreement with her father. Pursuant to our custody arrangement, we had agreed that she would be in New York during the week of the June 6, 2025 Settlement Conference. However, on May 15, 2025 I was informed that her father must undergo surgery and will require two to three weeks to recover, which impacts our shared custody schedule and my ability to travel to New York during that time.

In addition to the personal circumstances described above, I am not requesting to appear virtually for the Settlement Conference because Plaintiff's first language is Spanish, and his heart related medical conditions may impact his ability to participate without in person support. As such, he strongly prefers to appear in person with me, as I speak Spanish and have represented him since the onset of this case. I share that preference to ensure effective participation and meaningful progress toward resolution.

While I am currently requesting a three-week adjournment, the actual length of the adjournment may vary depending on the availability of Your Honor and all parties. I sincerely apologize for the inconvenience this may cause Your Honor and Counsel. We have been prepared to proceed with the Settlement Conference but unfortunately this situation is beyond my control.

Thank you for Your Honor's consideration of this request.

Respectfully submitted,

DEREK SMITH LAW GROUP, PLLC



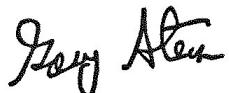
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cc: All Counsel of record via ECF

Application granted. The Settlement Conference scheduled for Friday, June 6, 2025 is hereby adjourned to Thursday, July 24, 2025 at 10:00 a.m.

Date: May 21, 2025
New York, NY

SO ORDERED:



HON. GARY STEIN
UNITED STATES MAGISTRATE JUDGE